

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:	:	Case No. 21-30618
	:	
Adam Witt and Suzanne Witt,	:	Chapter 7
	:	
Debtor.	:	Judge Humphrey

**MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER AUTHORIZING AND
APPROVING THE COMPROMISE OF A WRONGFUL DEATH CLAIM AND
APPROVING PAYMENTS TO SPECIAL COUNSEL AND OTHER SETTLEMENT
EXPENSES**

Now comes Matthew T. Schaeffer, Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of Adam and Suzanne Witt, and hereby moves this Court pursuant to Rule 9019(a) of the Rules of Bankruptcy Procedure for an order authorizing and approving the compromise that has been reached with regard to a certain claim held by Debtors and relating to the wrongful death of their daughter, Cheyenne Witt (“Cheyenne”). The only claim being settled is the claim pending against Jay Sadrinia, DMD, Northern Kentucky Dental Centers, PLLC, and Tri-State Dental Holdings, PLLC (the “Claim”). Because the settlement will result in surplus funds, the Trustee will abandon any remaining claims back to the Debtor after the settlement proceeds are paid. The Trustee also seeks authority to pay special counsel in accordance with the Court’s Order Granting Application of Chapter 7 Trustee to Employ Special Counsel (Doc. 24).

Specifically, the Trustee respectfully requests that the Court enter an order substantially in the form of **Exhibit A** attached hereto (i) approving the Proposed Settlement in the amount of \$425,000 (the “Settlement Proceeds”); and (ii) approving payment of special counsel fees in the amount of \$170,000 to The Lawrence Law Firm, PSC and expenses in the amount of \$9,292.07 to The Lawrence Law Firm, PSC in settlement of the Claim.

1. The material terms of the compromise (the “Proposed Settlement”) are as follows:
 - a. The Trustee seeks authorization to compromise and to settle the Claim by accepting the Settlement Proceeds;
 - b. Pursuant to 11 U.S.C §330, the Trustee is seeking to compensate Special Counsel for fees in the amount of \$170,000 and expenses in the amount of \$9,292.07.
2. The Trustee expects that the Debtors will also receive a substantial surplus after payment of claims.

A. Background

Cheyenne was a patient of Dr. Jay Sadrinia, DDS. Dr. Sadrinia owned and operated four dental practices in the Northern Kentucky area. In a criminally tragic course of events, Dr. Sadrinia prescribed—outside the usual course of professional practice and without a legitimate medical purpose—pharmaceuticals to Cheyenne which resulted in Cheyenne’s death in 2020. Dr. Sadrinia had prescribed four opioid prescriptions within a mere month, and three of those prescriptions occurred within a five-day window. On June 22, 2023, a jury found Dr. Sadrinia guilty of distribution of a controlled substance (28 U.S.C. section 841(a)(1)) and guilty of a controlled substance resulting in death (28 U.S.C. section (a)(1) and (b)(1)(C)). Dr. Sadrinia has been sentenced to 20 years in federal prison.

The Debtors, in their individual capacities and Suzanne Witt in her capacity as administratrix of Cheyenne’s estate retained The Lawrence Law Firm, PSC, and brought a number of claims against Dr. Sadrinia arising from Cheyenne’s death. The Court approved the retention of The Lawrence Law Firm, PSC (“Special Counsel”) as special counsel to the estate. *See Order Granting Application of Chapter 7 Trustee to Employ Special Counsel* (Doc. 24). Special Counsel has advised the Trustee that a proposed settlement favorable to the estate has been reached. Under

the proposal, the defendants will pay \$850,000. The proposed payment is apportioned 50/50 to the Witts and to Cheyenne's probate estate. Thus, \$425,000 will be apportioned to the Witts' bankruptcy estate, which will pay creditors in full and leave a substantial surplus for the Debtors. Further, the Trustee proposed to pay $\frac{1}{2}$ of the costs of counsel (with the probate estate paying the other half), which amounts to \$9,292.07 in expenses to be paid by the bankruptcy estate. Finally, the Proposed Settlement resolves a portion of the claims and does not include the claim remaining against the pharmacy. That claim and any other claims held by the estate will be abandoned back to the Debtors when the Settlement Proceeds are received.

B. Standard to be Applied by the Court

Rule 9019(a) of the Rules of Bankruptcy Procedure authorizes a bankruptcy court to approve compromises or settlements:

On motion by the trustee and after notice and a hearing, the court may approve a compromise or settlement. Notice shall be given to creditors, the United States trustee, the debtor, and indenture trustees as provided in Rule 2002 and to any other entity as the court may direct.

Fed. R. Bankr. P. 9019(a). This rule affords the Court broad authority to consider and to approve compromises and settlements. *See, In re Goldstein*, 131 B.R. 367 (Bankr. S.D. Ohio 1991). Prior to approving a compromise, the Court must determine that the proposed settlement is in the best interests of the debtor's estate. *In re Lee Way Holding, Co.*, 120 B.R. 881, 890 (Bankr. S.D. Ohio 1990) ("The benchmark for determining the propriety of a bankruptcy settlement is whether the settlement is in the best interests of the estate.").

Ultimately, the decision to approve a compromise lies within the discretion of the bankruptcy court. *In re SIS Corp.*, 108 B.R. 608, 612 (Bankr. N.D. Ohio 1989). The Court's analysis of a compromise should be flexible and take into account all circumstances of the particular controversy. *See, Myers v. Martin (In re Martin)*, 91 F.3d 389, 394 (3rd Cir. 1996). The

Court should also note that it “is well established that compromises are favored in bankruptcy.” *Lee Way*, 120 B.R. at 891.

Under Rule 9019, it is well established that the Court should consider the following factors when deliberating over the approval or disapproval of a proposed settlement:

- (1) The probability of success in the litigation to be settled;
- (2) The difficulties, if any, to be encountered in collecting a judgment if the estate prevails in litigation;
- (3) The complexity of the litigation involved, including the expense, inconvenience, and delay attendant to further proceedings; and
- (4) The paramount interests of the creditors, with appropriate deference to their reasonable views.

See, In re Goldstein, 131 B.R. at 369-70; *see also, In re Bell & Beckwith*, 93 B.R. 569, 574 (Bankr. N.D. Ohio 1989); *In re Carson*, 82 B.R. 847, 852 (Bankr. S.D. Ohio 1987).

Settlements and compromises should be rejected only if they fall “below the lowest point in the range of reasonableness.” *Cosoff v. Rodman (In re W.T. Grant Co.)*, 699 F.2d 599, 608 (2nd Cir. 1983). The settlement need not be the best that the Trustee could have possibly achieved but must only fall “within the reasonable range of litigation possibilities.” *In re Penn Central Transp. Co.*, 596 F.2d 1102, 1114 (3rd Cir. 1979). In making its determination, a court should not substitute its own judgment for that of the trustee, *See, In re Neshaminy Office Bldg. Assocs.*, 62 B.R. 798, 803 (E.D. Pa. 1986), nor is it necessary for a court to conduct a full evidentiary hearing or “mini trial” on the facts underlying the dispute. *In re A & C Properties*, 784 F.2d 1377, 1384 (9th Cir. 1986). Rather, a court need only consider those facts that are necessary to enable it to evaluate the settlement and to make an informed and independent judgment about the settlement. *In re Energy Co-operative, Inc.*, 886 F.2d 921, 924 (7th Cir. 1989).

B. Application of the Standard to this Case

a. Probability of Success in the Litigation

In reviewing the reasonableness of the Proposed Settlement, this Court must first look at the probability of success on the merits of the litigation. In this instance, Special Counsel believes that the probability of success in the litigation is substantial, but that outcome can be certain particularly when a jury must consider complex medical issues and competing experts. Special Counsel has extensive experience in pursuing these types of complex claims and believes that the Proposed Settlement is appropriate.

b. Difficulty of Collection

The second factor weigh in favor settlement. If the estate were litigate the claim, then collection will be substantially delayed. The Proposed Settlement will pay all creditors in full at the earliest opportunity.

c. Complexity, Expense and Burden of Litigation

The third factor that this Court must weigh in deciding whether to approve the Proposed Settlement is complexity of the litigation involved, including the expense, inconvenience, and burden attendant to further proceedings. Further litigating this claim has no benefit to the estate because the settlement will pay all creditors in full. Litigation would require expert analysis, discovery, and testimony. Special Counsel negotiated the Proposed Settlement at arm's length and has recommended that the Proposed Settlement be approved.

d. Interest of Creditors

In determining the reasonableness of the Proposed Settlement, this Court must also consider the paramount interests of the estate's creditors. The estate's creditors will be paid in full under the Proposed Settlement.

II. CONCLUSION

For the foregoing reasons, the Trustee respectfully requests that the Court enter an order substantially in the form of **Exhibit A** attached hereto (i) approving the Proposed Settlement of \$425,000; and (ii) approving payment of special counsel fees in the amount of \$170,000 to The Lawrence Law Firm, PSC and expenses in the amount of \$9,292.07 to The Lawrence Law Firm, PSC.

Respectfully submitted,

Dated: June 27, 2024

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer (0066750)
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
614-229-3289 (telephone) / 614-221-0479 (fax)
mschaeffer@baileycav.com
Attorney for Trustee

**NOTICE OF MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER AUTHORIZING
AND APPROVING THE COMPROMISE OF A WRONGFUL DEATH CLAIM AND
APPROVING PAYMENTS TO SPECIAL COUNSEL AND OTHER SETTLEMENT
EXPENSES**

PLEASE TAKE NOTICE THAT Matthew T. Schaeffer, Trustee, has filed the *Motion of Chapter 7 Trustee for an Order Authorizing and Approving the Compromise of a Wrongful Death Claim and Approving Payments to Special Counsel and Other Settlement Expenses* (the “Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the Motion, **then on or before twenty-one (21) days from the date set forth in the certificate of service for the Motion**, you or your attorney must file with the court a response explaining your position by mailing your response by regular U.S. Mail to **Clerk, United States Bankruptcy Court, 120 West Third Street, Dayton, Ohio 45402**, OR your attorney must file a response using the court’s ECF system.

The court must **receive** your response on or before the date set forth above.

You must also send a copy of your response either by 1) the court’s ECF System, or by 2) regular U.S. Mail to:

United States Trustee
170 North High Street, Suite 200
Columbus, Ohio 43215

Matthew T. Schaeffer
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief without further notice or hearing

Respectfully submitted,

Dated: June 27, 2024

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer (0066750)
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
614-229-3289 (telephone) / 614-221-0479 (fax)
mschaeffer@baileycav.com
Attorney for Trustee

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion of Chapter 7 Trustee for an Order Authorizing and Approving the Compromise of a Wrongful Death Claim and Approving Payments to Special Counsel and Other Settlement Expenses* was served (i) **electronically** on the date of filing through the court's ECF system on all ECF participants registered in the case at the email addresses registered with the court, and (ii) by **ordinary U.S. Mail** on June 27, 2024 upon the parties listed below and on the attached mailing matrix:

Jennifer L. Lawrence
The Lawrence Firm PSC
535 Madison Avenue, Suite 500
Covington, KY 41011

Adam Witt
Suzanne Witt
324 Floyd Street
Lewisburg, OH 45338-8053

Respectfully submitted,

Dated: June 27, 2024

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer (0066750)
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
614-229-3289 (telephone) / 614-221-0479 (fax)
mschaeffer@baileycav.com
Attorney for Trustee

Label Matrix for local noticing
0648-3
Case 3:21-bk-30618
Southern District of Ohio
Dayton
Mon Jun 24 12:09:02 EDT 2024

Asst US Trustee (Day)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215-2417

Axcess Financial
7755 Montgomery Rd
Cincinnati, OH 45236-4291

Johna M Bella
405 Madison Ave
Ste 2200
Toledo, OH 43604-1224

CCO Mortgage Corp.
Po Box 6260
Glen Allen, VA 23058-6260

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Choice Recovery
1105 Schrock Road
Suite 700
Columbus, OH 43229-1168

Comenity Bank/Lane Bryant
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenitybank/Jared
Po Box 182789
Columbus, OH 43218-2789

Conns
Attn: Bankruptcy
2445 Technology Forest Blvd, Bldg 4, Ste
The Woodlands, TX 77381-5259

Amazon Prime
410 Terry Avenue North
Seattle, WA 98109-5210

Avant
222 N. Lasalle St
Chicago, IL 60601-1003

Axcess Financial
7755 Montgomery Road
Suite 400
Cincinnati, OH 45236-4197

Brookville Family Care
950 Salem St
Brookville, OH 45309-8227

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Chase Mortgage
Chase Records Center/Attn: Correspondenc
Mail Code LA4 5555 700 Kansas Ln
Monroe, LA 71203

Comenity Bank/Jared
375 Ghent Rd
Akron, OH 44333-4601

Comenity Bank/Lane Bryant
Po Box 182789
Columbus, OH 43218-2789

Compunet
2308 Sandridge Drive
Dayton, OH 45439-1856

Conns
Box 2358
Beaumont, TX 77704-2358

American Medical Response of Ohio
3867 West Market Street PMB 155
Akron, OH 44333-4525

Avant
Attn: Bankruptcy
Po Box 9183380
Chicago, IL 60691-3380

BHK Financial
2222 S Dobson Road
Suite 1104
Mesa, AZ 85202-6201

(p)CCO MORTGAGE CORP
10561 TELEGRAPH RD
GLEN ALLEN VA 23059-4577

Capital One
Po Box 31293
Salt Lake City, UT 84131-0293

Choice Recovery
1105 Schrock Road
Columbus, OH 43229-1168

Comenity Bank/Jared
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Comenitybank/Jared
Attn: Bankruptcy
Po Box 182273
Columbus, OH 43218-2273

Compunet
2308 Sandridge Drive
Moraine, OH 45439-1856

Constar Financial Services, LLC
10400 N 25th Street
Suite 100
Phoenix, AZ 85028

Credit One Bank
Attn: Bankruptcy Department
Po Box 98873
Las Vegas, NV 89193-8873

Credit One Bank
Po Box 98872
Las Vegas, NV 89193-8872

Cricket
P.O. Box 6022
Greenwood Village, CO 80155-6022

Rebecca L Daum
30 E Broad Street
23rd Floor
Columbus, OH 43215-3414

Dayton Lung And Sleep Medicine
PO Box 634857
Cincinnati, OH 45263-4857

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Discover Financial
Attn: Bankruptcy
Po Box 3025
New Albany, OH 43054-3025

EOS CCA
PO BOX 981002
Boston, MA 02298-1002

Eaton Municipal Court
1199 Preble Dr
Eaton, OH 45320-9398

Emerald AR Systems
3636 N Central Ave
Phoenix, AZ 85012-1927

Emerald AR Systems
Attn: Bankruptcy
3636 North Central Ave, Ste 650
Phoenix, AZ 85012-1968

First Credit Union
1232 East Baseline
Tempe, AZ 85283-1450

First Credit Union
25 S. Arizona Place, Suite 111
Chandler, AZ 85225-5511

First Credit Union
Attn: Bankruptcy
Po Box 820
Chandler, AZ 85244-0820

First Electronic Bank
Attn: Bankruptcy
Po Box 521271
Salt Lake City, UT 84152-1271

First Electronic Bank
Po Box 4499
Beaverton, OR 97076-4499

First Premier Bank
3820 N Louise Ave
Sioux Falls, SD 57107-0145

First Premier Bank
Attn: Bankruptcy
Po Box 5524
Sioux Falls, SD 57117-5524

Freedom Mortgage Corporation
907 Pleasant Valley Ave
Mount Laurel, NJ 08054-1210

Freedom Mortgage Corporation
Attn: Bankruptcy
907 Pleasant Valley Ave, Ste 3
Mt Laurel, NJ 08054-1210

Anne Gilday
The Lawrence Firm, PSC
606 Philadelphia St.
Covington, KY 41011-1241

Greyston
1350 South Longmore
Mesa, AZ 85202-9601

Harley Davidson Financial
3850 Arrowhead Drive
Carson City, NV 89706-2016

Harley Davidson Financial
Attn: Bankruptcy
Po Box 22048
Carson City, NV 89721-2048

Harley Davidson Financial Services
PO Box 21908
Carson City, NV 89721-1908

Harris & Harris, LTD
111 West Jackson Blvd, Suite 400
Chicago, IL 60604-4135

Hughes Federal Credit Union
8095 S Nogales Hwy
Tucson, AZ 85706

Hughes Federal Credit Union
Attn: Bankruptcy
Po Box 11900
Tucson, AZ 85734-1900

Internal Revenue Service
Po Box 7346
Philadelphia, PA 19101-7346

JP Recovery Services
PO Box 16749
Rocky River, OH 44116-0749

John Bauer
3705 Marlane Drive
Grove City, OH 43123-8895

Jennifer L Lawrence
The Lawrence Firm, PSC
606 Philadelphia St
Covington, KY 41011-1241

Mary Elizabeth Lentz
Foss Lentz & Posey LLP
109 N. Main Street, 5th Floor
Dayton, OH 45402-1290

MVHE Inc
PO Box 932807
Cleveland, OH 44193-2807

Miami Valley Cardiologists
122 Wyoming St
Dayton, OH 45409-2781

Miami Valley Cardiologists
Po Box 16749
Rockey River, OH 44116-0749

Miami Valley Emergency Specialist
4460 Lake Forest Dr
Suite 216
Cincinnati, OH 45242-3755

(p)PREMIER HEALTH
PO BOX 932715
CLEVELAND OH 44193-0015

Miami Valley Hospital
PO Box 713072
Columbus, OH 43271-0001

Middletown Cardiovascular Assoc Inc
103 McKnight Drive, Suite A
Middletown, OH 45044-4891

Miramend Revenue Group
360 E. 22nd Street
Lombard, IL 60148-4924

Miramend Revenue Group
Attn: Bankruptcy
360 E. 22nd Street
Lombard, IL 60148-4924

Netflix
100 Winchester Circle
Los Gatos, CA 95032-1815

Ohio Department Of Taxation
150 E Gay St 21ST FL
Columbus, OH 43215-3191

Ohio Department of Taxation
P.O. Box 530
Columbus, OH 43216-0530

PennyMac Loan Services, LLC
Attn: Correspondence Unit
Po Box 514387
Los Angeles, CA 90051-4387

PennyMac Loan Services, LLC
Po Box 514387
Los Angeles, CA 90051-4387

Premier Cardiovascular Institute
1530 Needmore Road
Dayton, OH 45414-3980

Premier Cardiovascular Institute
2400 Maimi Valley Drive, #1000
Dayton, OH 45459-4774

Premier Cardiovascular Institute MVH N
9000 N Main Street, Suite 101
Dayton, OH 45415-1184

Premier Health Specialists
PO Box 932807
Cleveland, OH 44193-0022

Quest Diagnostics
PO Box 740810
Cincinnati, OH 45274-0810

(p)RBC INC
ATT ERIN WEISE
PO BOX 1548
MANSFIELD OH 44901-1548

RMP
200 14th Avenue East
Sartell, MN 56377-4500

RMP, LLC
POBox 519
Sauk Rapids, MN 56379-0519

Radiology Physicians
PO Box 714030
Cincinnati, OH 45271-4030

Radiology Physicians Inc
PO Box 1198
Somerset, PA 15501-0336

Brent Edward Rambo
Flanagan, Lieberman, Hoffman & Swaim
10 N. Ludlow Street
Ste 200
Dayton, OH 45402-1437

Rotech
PO Box 3475
Toledo, OH 43607-0475

SIMM Associates Inc
800 Pencader Drive
Newark, DE 19702-3354

Samaritan Family Care
PO Box 932807
Cleveland, OH 44193-0022

Matthew T Schaeffer
10 West Broad St
Suite 2100
Columbus, OH 43215-3455

Matthew T. Schaeffer
Bailey Cavalieri LLC
10 W. Broad St., Suite 2100
Columbus, OH 43215-3455

Scheer, Green & Burke, CO. LPA
1 Seagate
Suite 640
Toledo, OH 43604-4501

Scheer, Green, & Burke Co. L.P.A.
PO Box 1312
Toledo, OH 43603-1312

Spectrum
PO Box 1060
Carol Stream, IL 60132-1060

Eric A Stamps
Stamps & Stamps
3814 Little York Road
Dayton, OH 45414-2410

(p)STATE COLLECTION SERVICE INC
2509 S STOUTINGTON RD
MADISON WI 53716-3314

Synergetic Communication Inc
5450 NW Central #220
Houston, TX 77092-2061

Transworld Systems Inc
Collection Agency
500 Virginia Dr. Suite 514
Fort Washington, PA 19034-2733

Transworld Systems Inc
PO Box 15520
Wilmington, DE 19850-5520

UC Health
Po Box 630911
Cincinnati, OH 45263-0911

United Collection Bureau
5620 Southwyck Blvd
Toledo, OH 43614-1501

United Collection Bureau
PO Box 140190
Toledo, OH 43614-0190

Valley Pathologists
PO Box 73383
Cleveland, OH 44193-0002

Vantage West Credit Union
2480 N. Arcadia
Tucson, AZ 85712-5735

Vantage West Credit Union
Attn: Bankruptcy
Po Box 15115
Tucson, AZ 85708-0115

Verizon
by American InfoSource as agent
PO Box 4457
Houston TX 772104457

Verizon Wireless
500 Technology Drive
Suite 500
Weldon Springs, MO 63304-2225

Verizon Wireless
National Recovery Operations
Minneapolis, MN 55426

Adam Witt
324 Floyd Street
Lewisburg, OH 45338-8053

Suzanne Witt
324 Floyd Street
Lewisburg, OH 45338-8053

Wright State Physicians Surgery
ATTN # 8716K
PO Box 14000
Belfast, ME 04915-4033

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

CCO Mortgage Corp.
Attn: Bankruptcy
10561 Telegraph Rd
Glen Allen, VA 23059

Chase Auto Finance
Attn: Bankruptcy
Po Box 901076
Fort Worth, TX 76101

(d)Chase Auto Finance
P.o. Box 901003
Fort Worth, TX 76101

(d)Chase Card Services
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850

(d)Chase Card Services
Po Box 15369
Wilmington, DE 19850

(d)Chase Mortgage
700 Kansas Lane
Monroe, LA 71203

Discover Bank
C/O DB Servicing Corporation
6500 New Albany Rd E
New Albany, OH 43054

(d)Discover Financial
Pob 15316
Wilmington, DE 19850

Miami Valley Hospital
1 Wyoming St
Dayton, OH 45409-2722

(d)Miami Valley Hospital
PO Box 932715
Cleveland, OH 44193

(d)Premier Health
Miami Valley Hospital
PO Box 932715
Cleveland, OH 44193

RBC
283 Glessner Ave
Mansfield, OH 44903-2224

(d)RBC
PO Box 1548
Mansfield, OH 44901-1548

(d)RBC, Inc
Attn: Bankruptcy
Po Box 1548
Mansfield, OH 44901

(d)RBC, Inc
Po Box 1548
Mansfield, OH 44901

State Collection Service Inc
2509 S Stoughton Road
Madison, WI 53716

(d)State Collection Service Inc
PO Box 6250
Madison, WI 53716

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Citizens Bank, NA

(u)Miami Valley Hospital

(u)State of Ohio Department of Taxation

End of Label Matrix
Mailable recipients 113
Bypassed recipients 3
Total 116

EXHIBIT A – PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:	:	Case No. 21-30618
	:	
Adam Witt and Suzanne Witt,	:	Chapter 7
	:	
Debtor.	:	Judge Humphrey

**ORDER APPROVING MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER
AUTHORIZING AND APPROVING THE COMPROMISE OF A WRONGFUL DEATH
CLAIM AND APPROVING PAYMENTS TO SPECIAL COUNSEL AND OTHER
SETTLEMENT EXPENSES (DOC. ____)**

Upon the *Motion of Chapter 7 Trustee for an Order Authorizing and Approving the Compromise of a Wrongful Death Claim and Approving Payments to Special Counsel and Other Settlement Expenses* (Doc. ____), and more than twenty-one (21) days having elapsed from the date of service of the motion and no objection has been filed, it is hereby ORDERED AND DECREED that:

1. The Trustee is authorized to enter into the settlement of \$425,000.00 with respect to the wrongful death and related claims, including authority to execute any documents to effectuate the terms of the settlement; and

2. As part of the settlement, the Trustee is authorized to pay the following amounts: approving payment of special counsel fees in the amount of \$170,000 to The Lawrence Law Firm, PSC and expenses in the amount of \$9,292.07 to The Lawrence Law Firm, PSC.

IT IS SO ORDERED.

Submitted by,

/s/ Matthew T. Schaeffer
Matthew T. Schaeffer (0066750)
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
614-229-3289 (telephone) / 614-221-0479 (fax)
mschaeffer@baileycav.com
Counsel for Trustee

Copies to: Default List plus Special Counsel –
Jennifer L. Lawrence, The Lawrence Firm PSC, 535 Madison Avenue, Suite 500,
Covington, KY 41011